

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

DEFENDANT'S INITIAL DISCLOSURES

Unifund CCR Partners (the “Defendant”) makes the following initial disclosures pursuant to Rule 26 of the Federal Rules of Civil Procedure:

A. The Defendant believes the following persons may have discoverable information regarding the matters relevant to the Defendant's defenses in this lawsuit:

Patricia L. Baxter, Esq.
General Counsel
Unifund CCR Partners
10625 Techwoods Circle
Cincinnati, Ohio 45242

Angela Freckman
Legal Liaison
Unifund CCR Partners
10625 Techwoods Circle
Cincinnati, Ohio 45242

B. The Defendant will make available for review any documents it has in its possession, custody or control that may be used to support its contentions with respect to any significant factual issue in the case, to the extent it has not already produced such documents. These documents include, but are not limited to:

1. Credit Reports.
2. Account Statements.
3. Payment Histories.
4. Affidavits from the Defendant's predecessor in interest, Citicorp Credit Services, Inc.
5. Reports evidencing the timing and amount of payments from the Plaintiff.

C. The Defendant is not seeking any damages at this time. The Defendant reserves all rights, claims and defenses in this adversary proceeding, and will supplement this disclosure if it subsequently seeks damages in this adversary proceeding.

D. The Defendant does not believe that there will be an insurance agreement in which any person carrying on an insurance business may be liable to satisfy part or all of a judgment that may be entered in the adversary proceeding.

The Defendant hereby gives notice that it intends to rely upon such other supplemental disclosures that may become available or apparent during the course of discovery and thus reserves the right to amend its Initial Disclosures accordingly.

Respectfully submitted this the 28th day of August, 2006.

/s/ Chris Hawkins
Chris Hawkins

BRADLEY ARANT ROSE & WHITE LLP
One Federal Place
1819 Fifth Avenue North
Birmingham, Alabama 35203-2104
Telephone: (205) 521-8000
Facsimile: (205) 521-8500

CERTIFICATE OF SERVICE

The undersigned hereby certifies this 28th day of August, 2006, that a copy of the foregoing was delivered via ECF electronic filing or via United States Mail, postage prepaid, to the following:

David G. Poston
Brock & Stout
P. O. Drawer 311167
Enterprise, Alabama 36331

/s/ Chris Hawkins
Chris Hawkins